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15 **THE UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF NEVADA
17 (SOUTHERN DIVISION)**

18 GOLD LEAF OVERSEAS SA 4128, a privately held Panamanian
19 corporation, KILLSHUNT REALTY and DEVELOPMENT
20 CORPORATION, a privately held corporation registered in the
21 Philippines, and Craig Johnson, individually,

22 *Plaintiffs,*

23 *vs.*

24 Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, Marc
25 A. Grossman, Julia B. Sylva, individually and collectively the *RICO*
26 *Person Defendants,*

27 *and*

28 GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
29 International, LLC., GrupoMex Latin America, GrupoMex LLC., and
30 XCELL Security House, S.A. *Enterprise Members, Defendants in*
31 *Possession of Converted Assets,*

32 *and*

33 Manuel A. Hoth, Liana Pabuk, Ignacio C. Fernandez, Howard Cohen,
34 Joel Davies, Robert Saroukhannoff, John Doe and Jane Roe, 1-5,
35 individually and as Directors/Officers Members and/or Employees of
36 GrupoMex Enterprise LLC., *Enterprise members individual*
37 *Defendants Aiding/Abetting in Negligence,*

38 *Defendants.*

39 **13-cv-1750-RCJ- (CWH)**

40 **Notice of Motion For Entry of
41 Default Judgement Fed R. Civ. P. 55(a)**

42 Plaintiffs Gold Leaf Overseas SA 4128 ("Gold Leaf"), a privately held Panamanian
43 corporation, Killshunt Realty and Development Corporation ("KRDC"), a privately held
44 corporation registered in the Philippines, and Craig Johnson, (Johnson") individually move

1 this Court for a judgment and award in this action, and show that the complaint in the
 2 above case was filed in this court on September 24, 2013[DE-1.]; that the summons and
 3 complaint were duly served on the Defendant, Leticia R. Castro, Martha B. Castro, James
 4 a/k/a Jimmy Matute, individually, *and* GrupoMex Holding, LLC., GrupoMex Enterprises,
 5 LLC., GrupoMex International, LLC., GrupoMex Latin America, GrupoMex LLC., on the
 6 February 8, 2014 and on subsequent dates other notices and communication were served
 7 advising them of the action and of their default [DE "21-24", "33-37".]; no answer or
 8 other defense has been filed by the Defendants; default was entered in the civil docket in
 9 the office of this clerk on the 11th day of September 11, 2014; no proceedings have been
 10 taken by the Defendants since the default was entered; Defendants were and are not in the
 11 military service and are not infants or incompetent as appears in the declaration of
 12 plaintiffs' counsel Douglas R. Dollinger, Esq. submitted herewith.

13 **WHEREFORE**, plaintiffs move that this Court make and enter a judgment:

14 1) That Plaintiffs be granted a judgment for monetary, equitable and injunctive
 15 relief in the form of a constructive trust with disgorgement of ownership rights and
 16 turnover of the accounts held by Xell Security House and Finance, SA ("Xcell") on
 17 behalf of Leticia R. Castro, James a/k/a Jimmy Matute, individually, *and* GrupoMex
 18 Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex International, LLC., GrupoMex
 19 Latin America, GrupoMex LLC., from the resulting injury-damages to plaintiffs'
 20 businesses and property; including claims for breach of contract; profits attributable to
 21 the conversion-theft of the Joint Venture funds; profits in the loss of economic
 22 advantage; receipt of stolen property; damages for Negligence; Negligent Interference
 23 with Prospective Economic Advantage; Intentional Interference with Prospective
 24 Economic Advantage; Unjust Enrichment; Fraud-Misrepresentation as and on behalf of
 25 Gold Leaf a sum in the amount of One Million Three Hundred Thousand
 26 (\$1,300,000.00) Dollars plus accumulated interest as allowed by law upon all money
 27 from the time it became due and calculated from October 10, 2010 up to and including
 28 July 31, 2015; in the case of KRDC a sum in the amount of Nine Hundred Thousand

1 (\$900,000.00) Dollars, plus accumulated interest as allowed by law and calculated from
2 October 10, 2010 up to and including July 31, 2015; in the of and in the case of Johnson
3 a sum in the amount of One Million Three Hundred Thousand (\$1,500,000.00) plus
4 accumulated interest as allowed by law and calculated from October 10, 2010, up to and
5 including July 31, 201 each as recovery in actual losses and compensatory amounts in
6 the separate and actual damages-losses as may be awarded under the common law as
7 well as state law and federal codes, statutes and rules;

8 2) That Plaintiffs be granted pre-judgment accumulated interest at the maximum
9 rate of 23.5 % from October 10, 2010 up to and including July 31, 2015; said sum with
10 accumulated interest calculated to the date of July 31, 2015; together with post judgment
11 interest at the stator rate until said judgment is paid in full.

12 3) That Plaintiffs be granted such further relief as the Court may deem just.

13 Dated: July 28, 2015.

14 Respectfully submitted,
15

16 Douglas R. Dollinger, Esq.
17 Bar No. NY 2354926

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P.C. & Associates*

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24 /s/

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15 **THE UNITED STATES DISTRICT COURT**
16 **FOR THE DISTRICT OF NEVADA**
17 **(SOUTHERN DIVISION)**

18 GOLD LEAF OVERSEAS SA 4128, a privately held Panamanian
19 corporation, KILLSHUNT REALTY and DEVELOPMENT
20 CORPORATION, a privately held corporation registered in the
21 Philippines, and Craig Johnson, individually,

22 *Plaintiffs,*

23 *vs.*

24 Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, Marc
25 A. Grossman, Julia B. Sylva, individually and collectively the *RICO*
26 *Person Defendants,*

27 *and*

28 GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
29 International, LLC., GrupoMex Latin America, GrupoMex LLC., and
30 XCELL Security House, S.A. *Enterprise Members, Defendants in*
31 *Possession of Converted Assets,*

32 *and*

33 Manuel A. Hoth, Liana Pabuk, Ignacio C. Fernandez, Howard Cohen,
34 Joel Davies, Robert Saroukhannoff, John Doe and Jane Roe, 1-5,
35 individually and as Directors/Officers Members and/or Employees of
36 GrupoMex Enterprise LLC., *Enterprise members individual*
37 *Defendants Aiding/Abetting in Negligence,*

38 **13-cv-1750-RCJ- (CWH)**

39 **Attorney's Declaration For**
40 **Default And Request and For**
41 **Entry Of Default-Judgment**

42 Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs Gold Leaf Overseas
43 SA 4128 ("Gold Leaf"), a privately held Panamanian corporation, Killshunt Realty and
44 Development Corporation ("KRDC"), a privately held corporation registered in the

1 Philippines, and **Craig Johnson, (Johnson")** individually, file their Motion for Default
 2 and Judgment against defendants Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy
 3 Matute, GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex International,
 4 LLC., GrupoMex Latin America, GrupoMex LLC. Service of process was perfected on the
 5 February 8, 2014 and then again on March 20, 2014 with additional notice issued several
 6 times thereafter. [DE "21-24", "33-37".]

7 No answer or other defense was filed by the Defendants and Plaintiffs received a
 8 clerk's default in answering on September 11, 2014 and now move for entry of judgment
 9 for damages.

10 **INTRODUCTION**

11 On September 23, 2013, Plaintiffs brought this action against Defendants. The
 12 Complaint [DE- 1.] asserts claims against the Defendants requesting monetary, equitable
 13 and injunctive relief from the resulting injury to their businesses and property; including
 14 profits attributable to the conversion-theft of the Joint Venture funds; profits in the loss of
 15 economic advantage; receipt of stolen property; damages for Negligence; Negligent
 16 Interference with Prospective Economic Advantage; Intentional Interference with
 17 Prospective Economic Advantage; Unjust Enrichment; Fraud-Misrepresentation.

18 The Complaint sought on behalf of Gold Leaf a sum certain in the amount of One
 19 Million Three Hundred Thousand (\$1,300,000.00) Dollars; in the case of KRDC a sum
 20 certain in the amount of Nine Hundred Thousand (\$900,000.00) Dollars; and in the case
 21 of Johnson a sum certain in the amount of One Million Three Hundred Thousand
 22 (\$1,500,000.00) with each representing actual losses and compensatory amounts as may be
 23 applied under the law. [DE 1.]

24 Because the Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute,
 25 GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex International, LLC.,
 26 GrupoMex Latin America, GrupoMex LLC., have not filed an answer or other responsive
 27 pleading Plaintiffs are entitled to entry of a default judgment for their non RICO claims
 28 based upon the order of the Court dated July 24, 2015. [DE-37.]

1 XCELL Security House, S.A., ("XCELL") holds plaintiff's property as converted by
 2 defendants and as set forth in the Complaint and presents its declaration of intent to
 3 turnover the converted assets for assignment and liquidation as requested in the Complaint.
 4 [DE-1.] and [Exhibit "A".] XCELL is owed a sum of Two Hundred and Fifty-Two
 5 Thousand (\$252,000.00) Dollars as and for its safekeeping fees and upon receipt of a
 6 judgment issued by this Court will in accord with Swiss law and US law turnover the
 7 account assets of the Defendant Leticia R. Castro Letica Castro the named account holder
 8 for payment of their fees and liquidation as and for plaintiffs' damages.

9 **ARGUMENT**

10 The Court may enter a default against a party who has not filed a responsive
 11 pleading or otherwise defended the suit. Fed. R. Civ. P. 55(a); *see United States v.*
 12 *\$23,000 in U.S. Currency*, 346 F.3d 157, 163 (1st Cir. 2004); *N.Y. Life Ins. Co. v. Brown*,
 13 84 F.3d 137, 141 (5th Cir. 1996). The Clerk has entered default against the Defendants
 14 because the Defendants did not serve an answer to a claim set forth in the Complaint
 15 within 21 days after being served with the pleading. See, FED. R. CIV. P. 12(a)(1)(A)(i);
 16 *and see also* FED. R. CIV. P. 55(a).

17 The Defendants are not minors or an incompetent persons. *See* FED. R. CIV. P.
 18 55(b)(1).

19 The Defendants are not in military service. *See* 50 U.S.C. app. §521(b)(1).

20 Plaintiffs move for a default judgment on their claims, as well as attorney fees, costs
 21 and related damages.

22 Legal fees thus far paid were paid in the amount of Twenty Thousand (\$20,000.00)
 23 Dollars wherein Plaintiffs are seeking an award in that sum as expended for legal fees.

24 **CONCLUSION**

25 For these reasons, Gold Leaf Overseas SA 4128, a privately held Panamanian
 26 corporation, Killshunt Realty and Development Corporation, a privately held corporation
 27 registered in the Philippines, and Craig Johnson, individually requests that the Court grant
 28 their motion for default judgment against the Leticia R. Castro, Martha B. Castro, James

1 a/k/a Jimmy Matute, GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
2 International, LLC., GrupoMex Latin America, GrupoMex LLC., and further asks the court
3 to enter a default judgment in favor of the Plaintiffs on behalf of Gold Leaf a sum certain
4 in the amount of One Million Three Hundred Thousand (\$1,300,000.00) Dollars and in
5 the case of KRDC a sum certain in the amount of Nine Hundred Thousand (\$900,000.00)
6 Dollars and in the case of Johnson a sum certain in the amount of \$1,500,000.00 with a an
7 award of pre judgement interest at a rate of 23.5% from October 10, 2010 with the
8 calculations being for Gold Leaf \$ 2,305,789.04; for Killshunt \$1,596,315.49; and for
9 Johnson \$ 2,660,525.81. [See Exhibits "B" and "C".]; and against defendants the Leticia R.
10 Castro, Martha B. Castro, James a/k/a Jimmy Matute, GrupoMex Holding, LLC.,
11 GrupoMex Enterprises, LLC., GrupoMex International, LLC., GrupoMex Latin America,
12 GrupoMex LLC., together with attorney's fees as requested under the applicable, laws,
13 codes, statutes and rules; plus interest on the judgment at the legal rate until the judgment
14 is satisfied.

15 Dated: July 28, 2015.

16
17 Respectfully submitted,

18
19 Douglas R. Dollinger, Esq.

20 Pro Hac Vice

21 The Law Offices of Douglas R. Dollinger P.C. &
22 Associates

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24 White Plains, New York 10606

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27 E-mail: ddollingeresq@gmail.com

28 *Counsel for Plaintiffs*

29 /s/

30 Brandon L. Phillips, Esq.-Local Counsel

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Exhibit “A”

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16 FOR THE DISTRICT OF NEVADA
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18 GOLD LEAF OVERSEAS SA 4128, a privately held Panamanian
19 corporation, KILLSHUNT REALTY and DEVELOPMENT
20 CORPORATION, a privately held corporation registered in the
21 Philippines, and Craig Johnson, individually,

22 *Plaintiffs,*

23 *vs.*

24 Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, Marc
25 A. Grossman, Julia B. Sylva, individually and collectively the *RICO*
26 *Person Defendants,*

27 *and*

28 GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
29 International, LLC., GrupoMex Latin America, GrupoMex LLC., and
30 XCELL Security House, S.A. *Enterprise Members, Defendants in
31 Possession of Converted Assets,*

32 *and*

33 Manuel A. Hoth, Liana Pabuk, Ignacio C. Fernandez, Howard Cohen,
34 Joel Davies, Robert Saroukhannoff, John Doe and Jane Roe, I-5,
35 individually and as Directors/Officers Members and/or Employees of
36 GrupoMex Enterprise LLC., *Enterprise members individual*
37 *Defendants Aiding/Abetting in Negligence,*

38 *Defendants.*

39 **13-cv-1750-RCJ- (CWH)**

40 **Declaration of Lynnwood Farr
41 For XCELL Securities SA
42 For Turnover of Accounts**

43 Lynnwood Farr, pursuant to 28 U.S.C. § 1746 declare on this 28th day of July 2015, under the
44 penalties of perjury states that I am the president of XCELL Security House and Finance SA ("Xcell")

45 Declaration of Lynnwood Farr- Xcell Security House and Financial, SA

1 a company organized under Swiss law with offices located at Avenue de Béthusy 4- 1005 Lausanne.
2 Switzerland.

3 I make this declaration so as to advise the Court of Xcell's claim for payment of outstanding
4 invoices in the sum of \$252,000.00 USD and for its intent as a *defendant in Possession of Converted*
5 *Assets*, to turnover to Plaintiffs' Counsel assets held by Xcell in the name of Leticia R. Castro for
6 liquidation in payment of Plaintiffs' claims.

7 It is my understanding, and I have read the Complaint that the Plaintiffs Gold Leaf Overseas SA
8 4128, a privately held Panamanian corporation, Killshunt Realty and Development Corporation, a
9 privately held corporation registered in the Philippines, and Craig Johnson, individually, are with the
10 permission of the Court filing their Motion for Default and Judgment against defendants Leticia R.
11 Castro, Martha B. Castro, James a/k/a Jimmy Matute, GrupoMex Holding, LLC., GrupoMex
12 Enterprises, LLC., GrupoMex International, LLC., GrupoMex Latin America, GrupoMex LLC.

13 That the claims set forth among other claims in the Complaint a request for imposition of a
14 constructive trust and the termination of the property rights of these defendants including Leticia R.
15 Castro; meaning that the rights to the account holder Leticia R. Castro would upon this Court granting
16 the judgment become the property of Plaintiffs.

17 Under these circumstances, once the Court issues its judgement and upon payment of Xcell's
18 outstanding invoices the accounts would be formally reassigned to Plaintiffs' Counsel for liquidation.

19 I, Lynnwood declare under penalty of perjury under the laws of the United States of America
20 that the foregoing is true and correct.

21 Executed on July 28, 2015

22
23 
24 
25

25 Lynnwood Farr,
26 President
27 Xcell Security House and Financial, SA
28

Exhibit “B”

1 Brandon L. Phillips, Esq.-Local Counsel
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THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
(SOUTHERN DIVISION)

GOLD LEAF OVERSEAS SA 4128, a privately held Panamanian corporation, KILLSHUNT REALTY and DEVELOPMENT CORPORATION, a privately held corporation registered in the Philippines, and Craig Johnson, individually,

Plaintiffs,

vs.

16
17 Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, Marc
18 A. Grossman, Julia B. Sylva, individually and collectively the *RICO*
Person Defendants,

13-ev-1750-RCJ- (CWH)

Declaration of Accountant
Paul Friedlander on Interest
Calculation From October 10, 2010

and

16
17 GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
18 International, LLC., GrupoMex Latin America, GrupoMex LLC., and
19 XCELL Security House, S.A. *Enterprise Members, Defendants in*
20 *Possession of Converted Assets,*

and

16
17 Manuel A. Hoth, Liana Pabuk, Ignacio C. Fernandez, Howard Cohen,
18 Joel Davies, Robert Saroukhannoff, John Doe and Jane Roe, 1-5,
19 individually and as Directors/Officers Members and/or Employees of
20 GrupoMex Enterprise LLC., *Enterprise members individual*
Defendants Aiding/Abetting in Negligence,

Defendants.

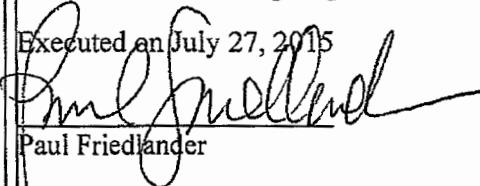
1 Paul Friedlander, pursuant to 28 U.S.C. § 1746 declare on this 27th day of July 2015, under the
 2 penalties of perjury states that I am an accountant located in the state of New York and have been
 3 retained in this matter by the Law Office of Douglas R. Dollinger, P.C. and Associates.

4 I was provide with copies of the Complaint in these proceedings to render calculations on
 5 interest which may be payable in the circumstances of this case on matters concerning injury-damages
 6 to plaintiffs' businesses and property; including claims for breach of contract; profits attributable to
 7 the conversion-theft of the Joint Venture funds; profits in the loss of economic advantage; receipt of
 8 stolen property; damages for Negligence; Negligent Interference with Prospective Economic
 9 Advantage; Intentional Interference with Prospective Economic Advantage; Unjust Enrichment;
 10 Fraud-Misrepresentation as and on behalf of **Gold Leaf Overseas SA 4128** ("Gold Leaf"), a sum in
 11 the amount of One Million Three Hundred Thousand (\$1,300,000.00) Dollars plus accumulated
 12 prejudgment interest calculated from October 10, 2010 up to and including July 31, 2015; in the
 13 case of , **Killshunt Realty and Development Corporation** ("Killshunt") a sum in the amount of
 14 Nine Hundred Thousand (\$900,000.00) Dollars, plus accumulated prejudgment interest calculated
 15 from October 10, 2010 up to and including July 31, 2015; in the case of , **Craig Johnson**
 16 ("Johnson") a sum in the amount of Nine Hundred Thousand (1,500,000.00) Dollars, plus
 17 accumulated prejudgment interest calculated from October 10, 2010 up to and including July 31,
 18 2015.

19 I make this declaration so as to advise the Court of the calculation of pre judgment interest
 20 payable since the date of October 10, 2010 at a rate of interest set at 23.5% per annum compounded
 21 annually. Using this interest rate with the default date due from October 10, 2010 the calculations for
 22 pre judgment interest only to July 31, 2015 would be for **Gold Leaf \$ 2,305,789.04**; for **Killshunt**
 23 **\$1,596,315.49**; and for **Johnson \$ 2,660,525.81**. [See Exhibit "C".]

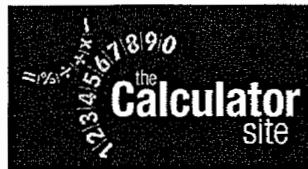
24 I, Paul Friedlander, declare under penalty of perjury under the laws of the United States of
 25 America that the foregoing is true and correct.

26 Executed on July 27, 2015

27 
 28 Paul Friedlander

Declaration of Accountant Paul Friedlander

Exhibit “C”



Compound Interest Calculator

Work out the **compound interest on your savings** with these popular calculators. Use the first calculator to include regular monthly deposits or withdrawals (for retirement calculations, etc). Use the second calculator to work out interest on a simple lump sum savings amount. In our article archive, you can [learn about compound interest](#) or read our article explaining the [formula for compound interest](#).

Regular Deposit / Withdrawal

GOLD LEAF

| | | |
|---|--|--|
| CURRENCY: | <input style="border: 1px solid black; padding: 2px 10px; width: 150px; height: 20px; border-radius: 5px;" type="button" value="Dollar (\$)"/> | |
| BASE AMOUNT: | \$ <input style="width: 150px; height: 25px; border: 1px solid black; border-radius: 5px;" type="text" value="1300000"/> | |
| ANNUAL INTEREST RATE: | <input style="width: 50px; height: 25px; border: 1px solid black; border-radius: 5px;" type="text" value="23.5"/> | % |
| CALCULATION PERIOD: | <input style="width: 50px; height: 25px; border: 1px solid black; border-radius: 5px;" type="text" value="58"/> | <input style="border: 1px solid black; padding: 2px 10px; width: 100px; height: 20px; border-radius: 5px;" type="button" value="months"/> |
| REGULAR MONTHLY? | <input style="border: 1px solid black; padding: 2px 10px; width: 50px; height: 25px; border-radius: 5px;" type="button" value="\$"/> | <input style="border: 1px solid black; padding: 2px 10px; width: 100px; height: 20px; border-radius: 5px;" type="button" value="deposit"/> |
| INCREASE DEPOSITS/WITHDRAWALS YEARLY WITH INFLATION? | <input type="checkbox"/> | |
| COMPOUND INTERVAL: | <input style="border: 1px solid black; padding: 2px 10px; width: 150px; height: 25px; border-radius: 5px;" type="button" value="Yearly"/> | |
| <input style="border: 1px solid black; padding: 5px 20px; border-radius: 5px;" type="button" value="Calculate"/> <input style="border: 1px solid black; padding: 5px 20px; border-radius: 5px;" type="button" value="Reset"/> | | |

Calculation results

Gold LEAF

(interest compounded yearly - added at the end of each year)

| Month | Month Interest | Total Interest | Balance |
|-------|----------------|----------------|----------------|
| 1 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 2 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 3 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 4 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 5 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 6 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 7 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 8 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 9 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 10 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 11 | \$0.00 | \$0.00 | \$1,300,000.00 |
| 12 | \$305,500.00 | \$305,500.00 | \$1,605,500.00 |
| 13 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 14 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 15 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 16 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 17 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 18 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 19 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 20 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 21 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 22 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 23 | \$0.00 | \$305,500.00 | \$1,605,500.00 |
| 24 | \$377,292.50 | \$682,792.50 | \$1,982,792.50 |
| 25 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 26 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 27 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 28 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 29 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 30 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 31 | \$0.00 | \$682,792.50 | \$1,982,792.50 |

GOLD LEAF

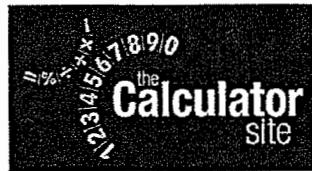
| | | | |
|----|--------------|----------------|----------------|
| 32 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 33 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 34 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 35 | \$0.00 | \$682,792.50 | \$1,982,792.50 |
| 36 | \$465,956.24 | \$1,148,748.74 | \$2,448,748.74 |
| 37 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 38 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 39 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 40 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 41 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 42 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 43 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 44 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 45 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 46 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 47 | \$0.00 | \$1,148,748.74 | \$2,448,748.74 |
| 48 | \$575,455.95 | \$1,724,204.69 | \$3,024,204.69 |
| 49 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 50 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 51 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 52 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 53 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 54 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 55 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 56 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 57 | \$0.00 | \$1,724,204.69 | \$3,024,204.69 |
| 58 | \$581,584.35 | \$2,305,789.04 | \$3,605,789.04 |

Base amount: \$1,300,000.00

Interest Rate: 23.5%

Effective Annual Rate: 23.5%

Calculation period: 58 months



Compound Interest Calculator

Work out the **compound interest** on your savings with these popular calculators. Use the first calculator to include regular monthly deposits or withdrawals (for retirement calculations, etc). Use the second calculator to work out interest on a simple lump sum savings amount. In our article archive, you can [learn about compound interest](#) or read our article explaining the [formula for compound interest](#).

Regular Deposit / Withdrawal

KILLSTHOUT

| | | |
|---|---|---|
| CURRENCY: | Dollar (\$) <input checked="" type="checkbox"/> | |
| BASE AMOUNT: | \$ 900000 | |
| ANNUAL INTEREST RATE: | 23.5 | % |
| CALCULATION PERIOD: | 58 | months <input checked="" type="checkbox"/> |
| REGULAR MONTHLY? | \$ <input type="text"/> | deposit <input checked="" type="checkbox"/> |
| INCREASE DEPOSITS/WITHDRAWALS YEARLY WITH INFLATION? | <input type="checkbox"/> | |
| COMPOUND INTERVAL: | Yearly <input checked="" type="checkbox"/> | |
| <input type="button" value="Calculate"/> <input type="button" value="Reset"/> | | |

KILLSTOUT

Calculation results

(interest compounded yearly - added at the end of each year)

| Month | Month Interest | Total Interest | Balance |
|-------|----------------|----------------|----------------|
| 1 | \$0.00 | \$0.00 | \$900,000.00 |
| 2 | \$0.00 | \$0.00 | \$900,000.00 |
| 3 | \$0.00 | \$0.00 | \$900,000.00 |
| 4 | \$0.00 | \$0.00 | \$900,000.00 |
| 5 | \$0.00 | \$0.00 | \$900,000.00 |
| 6 | \$0.00 | \$0.00 | \$900,000.00 |
| 7 | \$0.00 | \$0.00 | \$900,000.00 |
| 8 | \$0.00 | \$0.00 | \$900,000.00 |
| 9 | \$0.00 | \$0.00 | \$900,000.00 |
| 10 | \$0.00 | \$0.00 | \$900,000.00 |
| 11 | \$0.00 | \$0.00 | \$900,000.00 |
| 12 | \$211,500.00 | \$211,500.00 | \$1,111,500.00 |
| 13 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 14 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 15 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 16 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 17 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 18 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 19 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 20 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 21 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 22 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 23 | \$0.00 | \$211,500.00 | \$1,111,500.00 |
| 24 | \$261,202.50 | \$472,702.50 | \$1,372,702.50 |
| 25 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 26 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 27 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 28 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 29 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 30 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 31 | \$0.00 | \$472,702.50 | \$1,372,702.50 |

KILLSHUNT

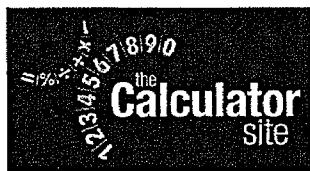
| | | | |
|----|--------------|----------------|----------------|
| 32 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 33 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 34 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 35 | \$0.00 | \$472,702.50 | \$1,372,702.50 |
| 36 | \$322,585.09 | \$795,287.59 | \$1,695,287.59 |
| 37 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 38 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 39 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 40 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 41 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 42 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 43 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 44 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 45 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 46 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 47 | \$0.00 | \$795,287.59 | \$1,695,287.59 |
| 48 | \$398,392.58 | \$1,193,680.17 | \$2,093,680.17 |
| 49 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 50 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 51 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 52 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 53 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 54 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 55 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 56 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 57 | \$0.00 | \$1,193,680.17 | \$2,093,680.17 |
| 58 | \$402,635.32 | \$1,596,315.49 | \$2,496,315.49 |

Base amount: \$900,000.00

Interest Rate: 23.5%

Effective Annual Rate: 23.5%

Calculation period: 58 months



Compound Interest Calculator

Work out the **compound interest on your savings** with these popular calculators. Use the first calculator to include regular monthly deposits or withdrawals (for retirement calculations, etc). Use the second calculator to work out interest on a simple lump sum savings amount. In our article archive, you can [learn about compound interest](#) or read our article explaining the [formula for compound interest](#).

Regular Deposit / Withdrawal

Johnson

| | | |
|---|---|---|
| CURRENCY: | Dollar (\$) <input checked="" type="checkbox"/> | |
| BASE AMOUNT: | \$ 1500000 | |
| ANNUAL INTEREST RATE: | 23.5 | % |
| CALCULATION PERIOD: | 58 | months <input checked="" type="checkbox"/> |
| REGULAR MONTHLY? | \$ <input type="text"/> | deposit <input checked="" type="checkbox"/> |
| INCREASE DEPOSITS/WITHDRAWALS YEARLY WITH INFLATION? | <input type="checkbox"/> | |
| COMPOUND INTERVAL: | Yearly <input checked="" type="checkbox"/> | |
| <input type="button" value="Calculate"/> <input type="button" value="Reset"/> | | |

Johnson

Calculation results

(interest compounded yearly - added at the end of each year)

| Month | Month Interest | Total Interest | Balance |
|-------|----------------|----------------|----------------|
| 1 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 2 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 3 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 4 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 5 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 6 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 7 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 8 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 9 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 10 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 11 | \$0.00 | \$0.00 | \$1,500,000.00 |
| 12 | \$352,500.00 | \$352,500.00 | \$1,852,500.00 |
| 13 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 14 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 15 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 16 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 17 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 18 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 19 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 20 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 21 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 22 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 23 | \$0.00 | \$352,500.00 | \$1,852,500.00 |
| 24 | \$435,337.50 | \$787,837.50 | \$2,287,837.50 |
| 25 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 26 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 27 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 28 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 29 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 30 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 31 | \$0.00 | \$787,837.50 | \$2,287,837.50 |

Johnson

| | | | |
|----|--------------|----------------|----------------|
| 32 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 33 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 34 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 35 | \$0.00 | \$787,837.50 | \$2,287,837.50 |
| 36 | \$537,641.81 | \$1,325,479.31 | \$2,825,479.31 |
| 37 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 38 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 39 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 40 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 41 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 42 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 43 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 44 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 45 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 46 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 47 | \$0.00 | \$1,325,479.31 | \$2,825,479.31 |
| 48 | \$663,987.64 | \$1,989,466.95 | \$3,489,466.95 |
| 49 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 50 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 51 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 52 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 53 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 54 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 55 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 56 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 57 | \$0.00 | \$1,989,466.95 | \$3,489,466.95 |
| 58 | \$671,058.86 | \$2,660,525.81 | \$4,160,525.81 |

Base amount: \$1,500,000.00

Interest Rate: 23.5%

Effective Annual Rate: 23.5%

Calculation period: 58 months

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e-mail: *ddollingeresq@gmail.com*

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
(SOUTHERN DIVISION)**

GOLD LEAF OVERSEAS SA 4128, a privately held Panamanian corporation, KILLSHUNT REALTY and DEVELOPMENT CORPORATION, a privately held corporation registered in the Philippines, and Craig Johnson, individually,

Plaintiffs,

vs.

Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, Marc A. Grossman, Julia B. Sylva, individually and collectively the *RICO Person Defendants*.

and

GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex International, LLC., GrupoMex Latin America, GrupoMex LLC., and XCELL Security House, S.A. *Enterprise Members, Defendants in Possession of Converted Assets.*

and

Manuel A. Hoth, Liana Pabuk, Ignacio C. Fernandez, Howard Cohen, Joel Davies, Robert Saroukhianoff, John Doe and Jane Roe, 1-5, individually and as Directors/Officers Members and/or Employees of GrupoMex Enterprise LLC., *Enterprise members individual Defendants Aiding/Abetting in Negligence.*

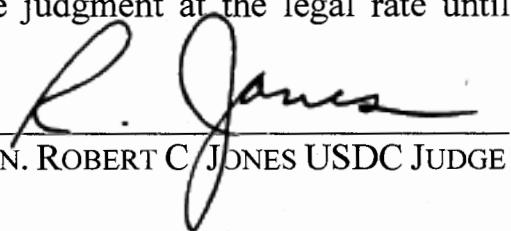
Defendants.

13-cv-1750-RCJ- (CWH)

Default Judgment
Fed R. Civ P. 55(a)

The defendant(s), Leticia R. Castro, Martha B. Castro, James a/k/a Jimmy Matute, individually, and GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex

1 International, LLC., GrupoMex Latin America, GrupoMex LLC., having failed to appear,
 2 plead or otherwise defend in this action, and default having been entered on September 11,
 3 2104 and counsel for plaintiff(s) having requested judgment against the defaulted
 4 defendant(s) and having filed a proper motion and declaration-exhibits in accordance with
 5 Federal Rule of Civil Procedure 55 (a) and (b); Judgment is hereby granted on the complaint
 6 for the claims of equitable, and injunctive relief in the form of a conversion-constructive
 7 trust and turnover of the assets of the defendants held by XCell Security House and
 8 Financial, SA with an award in monetary damages to be entered in favor of plaintiff(s)
 9 Gold Leaf Overseas SA 4128, a privately held Panamanian corporation, Killshunt Realty
 10 and Development Corporation, a privately held corporation registered in the Philippines,
 11 and Craig Johnson, individually against Leticia R. Castro, Martha B. Castro, James a/k/a
 12 Jimmy Matute, GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
 13 International, LLC., GrupoMex Latin America, GrupoMex LLC., and the Court further
 14 directs entry of a judgment granting in favor of the Plaintiffs Gold Leaf Overseas SA 4128
 15 a sum certain in the amount of One Million Three Hundred Thousand (\$1,300,000.00)
 16 Dollars and in the case of Killshunt Realty and Development Corporation a sum certain in
 17 the amount of Nine Hundred Thousand (\$900,000.00) Dollars and in the case of Craig
 18 Johnson a sum certain in the amount of One Million Three Hundred Thousand
 19 (\$1,500,000.00) with a an award of pre judgement interest at a rate of 23.5% from October
 20 10, 2010 with the calculations being for Gold Leaf Overseas SA 4128 \$ 2,305,789.04; for
 21 Killshunt Realty and Development Corporation \$ 1,596,315.49; and for Craig Johnson \$
 22 2,660,525.81, and against defendants the Leticia R. Castro, Martha B. Castro, James a/k/a
 23 Jimmy Matute, GrupoMex Holding, LLC., GrupoMex Enterprises, LLC., GrupoMex
 24 International, LLC., GrupoMex Latin America, GrupoMex LLC., under the applicable,
 25 laws, codes, statutes and rules; plus interest on the judgment at the legal rate until the
 26 judgment is satisfied.


 HON. ROBERT C. JONES USDC JUDGE

27 Dated: August 25, 2015.
 28

1 Respectfully submitted:
2



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10 Facsimile: 845-915-6801
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12 /S/

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